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8 Attorneys for Defendants  
9 MAXEON SOLAR TECHNOLOGIES, LTD.,  
10 WILLIAM MULLIGAN, and KAI  
11 STROHBECKE

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

19 JEYAKUMAR VS MENON, Individually  
20 and on Behalf of All Others Similarly  
21 Situated,

22 Plaintiff,

23 vs.

24 MAXEON SOLAR TECHNOLOGIES,  
25 LTD., WILLIAM MULLIGAN, and KAI  
26 STROHBECKE,

27 Defendants.

28 CASE NO. 3:24-CV-03869-EMC

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEFENDANTS'  
TIME TO RESPOND TO THE SECOND  
AMENDED COMPLAINT**

1 WHEREAS, on November 8, 2024, Plaintiff Jeyakumar VS Menon (“Plaintiff”) filed an  
2 amended class action complaint (ECF No. 66);

3 WHEREAS, on December 20, 2024, Defendants Maxeon Solar Technologies, Ltd.  
4 (“Maxeon”), William Mulligan, and Kai Strohbecke (collectively “Defendants”, and together with  
5 Plaintiff, the “Parties”) filed a motion to dismiss the amended class action complaint (See ECF Nos.  
6 70-72);

7 WHEREAS, on April 28, 2025, the Court entered an Order Granting Defendants’ Motion to  
8 Dismiss Plaintiff’s Amended Class Action Complaint with leave for Plaintiff to file a second amended  
9 complaint within four weeks of the order and, if a second amended complaint was filed, permitting  
10 Defendants to have four weeks thereafter to file a response (ECF No. 90);

11 WHEREAS, on May 27, 2025, Plaintiff filed the Second Amended Class Action Complaint  
12 against Defendants (ECF No. 91, “the Second Amended Complaint”);

13 WHEREAS, Defendants have recently retained new counsel;

14 THEREFORE, in light of the foregoing, the Parties hereby stipulate, and respectfully request  
15 the Court to order, as follows:

16 1. Defendants shall have until July 11, 2025, to file and serve their response to the Second  
17 Amended Complaint;

18 2. To the extent Defendants file a motion to dismiss the Second Amended Complaint,  
19 Plaintiff shall file and serve any response in opposition to Defendants’ motion to dismiss by August  
20 8, 2025, and Defendants shall file and serve any reply by August 22, 2025.

21 3. Nothing in this Stipulation is intended in any way to waive or affect any rights, claims,  
22 defenses, objections or arguments that any party may have with respect to any matter, other than those  
23 expressly addressed and agreed to in paragraphs 1 through 2 above.

24 IT IS SO STIPULATED.  
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2 DATED: June 20, 2025

*/s/ Yi-Chin Ho*  
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*KAI STROHBECKE*

8  
 9 */s/James M. Wilson Jr.*  
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22 *Attorneys for Lead Plaintiff JEYAKUMAR VS MENON*  
 23 *and Lead Counsel for the putative class*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(I)(3)**

I, Yi-Chin Ho, attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: June 20, 2025

/s/ Yi-Chin Ho

Yi-Chin Ho

## [PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: June \_\_, 2025

The Honorable Edward M. Chen  
United States District Judge